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>>> Charlie Gjersvik <gjersvik@m6.sprynet.com> 10/24/96 06:32pm >>>  
Dear Mr. Timm:

In reviewing the proposed test rule for hazardous air pollutants I noticed that it will apply to manufacturers and processors. However, I could not find these terms defined in the proposed rule or in 40 CFR 790. I am trying to determine if a proposed fertilizer plant might be subject to this rule when it is finalized. The proposed facility will produce carbonyl sulfide and an intermediate byproduct of coal gasification. The carbonyl sulfide is then totally consumed in the production of elemental sulfur. Carbonyl sulfide is not produced as a finished product or stored for use in manufacturing sulfur. As you can see, knowing where to find the definition of what constitutes a manufacturer or processor is key to determining the applicability of this proposed rule to the facility and subsequently, whether the owner/operator should comment on the proposed rule. Thank you for your assistance.

Sincerely,  
Charles Gjersvik  
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cc: ECKERSON-DAYTON, DCOGC.DCRGCCCU.GOLBERG-ARON



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